

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 20-1713 (CFC)
)	
THALES DIS AIS USA, LLC;)	
THALES DIS AIS DEUTSCHLAND)	
GMBH, THALES USA, INC.,)	
THALES S.A., CALAMP CORP.,)	
XIRGO TECHNOLOGIES, LLC, and)	
LAIRD CONNECTIVITY, INC.)	
)	
Defendants.)	

**DEFENDANT THALES DIS AIS DEUTSCHLAND
GMBH'S MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, Defendant Thales DIS AIS Deutschland GmbH (“Thales”) respectfully moves for a preliminary injunction prohibiting Plaintiff Koninklijke Philips N.V. (“Philips”) from pursuing Investigation No. 337-TA-1240 in the United States International Trade Commission with respect to Thales’ cellular communication modules and products containing the same while the Court adjudicates the fair, reasonable, and non-discriminatory terms and conditions for Philips’ worldwide portfolio of standard-essential patents relating to the 3G UMTS

and 4G/LTE mobile communication standards.¹ The grounds for this Motion are set forth in the Brief in Support of Defendant Thales DIS AIS Deutschland GmbH's Motion for a Preliminary Injunction and the associated Declarations, Appendix, and Exhibits submitted herewith.

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March 5, 2021

¹ Pursuant to D. Del. LR 7.1.1, Defendant's counsel represents that counsel for the parties, including Delaware counsel, discussed the subject matter of this Motion and the relief sought, and that the parties have been unable to reach agreement.

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XIRGO TECHNOLOGIES, LLC, and)	
LAIRD CONNECTIVITY, INC.)	
)	
Defendants.)	

**[PROPOSED] ORDER GRANTING
DEFENDANT THALES DIS AIS DEUTSCHLAND
GMBH’S MOTION FOR A PRELIMINARY INJUNCTION**

WHEREAS, Defendant Thales DIS AIS Deutschland GmbH (“Thales”), having moved for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65(a) (the “Motion”), and

WHEREAS, the Court having considered the Motion and any opposition thereto,

IT IS HEREBY ORDERED this day of _____, 2021, as follows:

1. The motion is **GRANTED**;
2. Plaintiff Koninklijke Philips N.V. (“Philips”) and its affiliates (including Philips RS North America LLC (f/k/a Respirationics, Inc.)) shall

immediately cease pursuing Investigation No. 337-TA-1240 in the United States International Trade Commission with respect to Thales' cellular communication modules and products containing the same.

3. Philips, its officers, employees, agents, servants, and attorneys, and other persons and entities in active concert or participation with them who receive actual notice of this Order, are preliminarily restrained and enjoined from pursuing Investigation No. 337-TA-1240 in the United States International Trade Commission with respect to Thales' cellular communication modules and products containing the same.

4. This Order shall remain in effect until further order of the Court.

The Honorable Colm F. Connolly
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on March 5, 2021, upon the following in the manner indicated:

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